

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Kevin McNulty
	:	
v.	:	Crim. No. 23-345
	:	
ELI SCHAMOVIC	:	18 U.S.C. §§ 1957 and 2

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

1. At various times relevant to this Information:
 - a. Defendant ELI SCHAMOVIC (“SCHAMOVIC”) was a resident of Lakewood, New Jersey.
 - b. Company-1 was a multinational financial services corporation that specialized in payment cards, and which was headquartered in New York.
 - c. Entity-1 was a New Jersey entity formed by SCHAMOVIC. SCAHMOVIC established Entity-1, and at least one other entity, as merchants that used multiple credit card processing companies.
 - d. SCHAMOVIC was the signatory to a bank account held by Entity-1 at Bank-1 (the “Entity-1 Bank Account”).
 - e. SCHAMOVIC made or caused others to make numerous fraudulent financial transactions through Entity-1 and other entities with payment cards issued by Company-1 (the “Fraudulent Transactions”). Many of the Fraudulent Transactions were conducted at SCHAMOVIC’s personal residence. The Fraudulent Transactions resulted in losses to Company-1 of more than \$1,000,000.

f. SCHAMOVIC laundered portions of the proceeds of this scheme by transferring the funds to other bank accounts controlled by SCHAMOVIC.

2. On or about June 27, 2018, the defendant,

ELI SCHAMOVIC,

did knowingly engage and attempt to engage in a monetary transaction by, through, and to a financial institution, in and affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, namely, an electronic wire transfer in the amount of approximately \$500,000 from the Entity-1 Bank Account to a bank account held at another financial institution, at least \$100,000 of such property having been derived from a specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Section 1957(a) and Section 2.

FORFEITURE ALLEGATION

1. As the result of committing the offense in violation of Title 18, United States Code, Section 1957(a) alleged in this Information, the defendant,

ELI SCHAMOVIC,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real and personal, involved in the money laundering offense, and all property traceable to such property.

SUBSTITUTE ASSETS PROVISION

2. If any of the property described above as being subject to forfeiture, as result of any act or omission of the defendant ELI SCHAMOVIC,

(a) cannot be located upon the exercise of due diligence;

(b) cannot be located upon the exercise of due diligence;

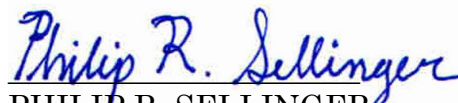
(c) has been transferred or sold to, or deposited with, a third party;

(d) has been placed beyond the jurisdiction of the court;

(e) has been substantially diminished in value; or

(f) has been commingled with other property which cannot be divided,

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of ELI SCHAMOVIC up to the value of the forfeitable property.


PHILIP R. SELLINGER
United States Attorney